



322 8TH AVENUE
NEW YORK NEW YORK 10001

TEL (212) 675-7900
FAX (212) 675-2433
TELEX: 236333

PARIS
LOS ANGELES
WASHINGTON

April 30, 1996

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20054

RECEIVED

MAY 1 - 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Sygma Comments
RM-8784

Dear Mr. Caton:

Attached are the Comments of Sygma Photo News concerning the petition of Sky Station International, Inc. to establish a Global Stratospheric Telecommunications Service (GSTS).

An original and five copies of the Comments are provided.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eliane Laffont".

Eliane Laffont
President

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 1 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of Amendment of Parts 2
and 15 of the Commission's Rules to
Permit Use of Radio Frequencies Above
40 GHz for New Radio Applications

RM-8784

Petition of Sky Station International, Inc.
Amendment of the Commission's
Rules to Establish Requirements for a
Global Stratospheric Telecommunications
Service in the 47.2-47.5 GHz and
47.9-48.2 GHz Frequency Bands

COMMENTS

Syigma Photo News, Inc. submits these Comments in support of the Petition of Sky Station International, Inc. to establish a new Global Stratospheric Telecommunications Service. As one of the world's largest photo news agencies we recognize the remarkable capabilities that GSTS provides to users worldwide and we are excited about the prospect of using GSTS to deliver news photographs and other large digital files directly from their source wherever that is in the world to the public throughout the world. Accordingly, we urge the Commission to adopt rapid approval and implementation of GSTS without delay so that news images and information -- and the vital corresponding educational and social benefits resulting from unrestricted access to news images-- may be made available to all of the world's population through the remarkable mobile broadband service that GSTS will deliver.

Statement of Interest

Based in Paris, Sygma was founded in 1973 and has long been considered the world's number one photo news and image agency. Sygma has offices and subagencies in over 40 countries, and represents 2,000 of the world's top award-winning photojournalists and fine art photographers and over 24 million images, making Sygma the world's largest archives of images covering news events from 1843 to the present day. In its efforts to cover breaking global news, Sygma dispatches photographs daily worldwide to provide information to newspapers, magazines, television and the Internet to hundreds of millions of readers, viewers and users. Within a moment's notice, Sygma photographers are in place whenever and wherever news breaks, coordinated by our worldwide offices and resources. As a pioneer in the use of digitization and telecommunications within a photo news agency, Sygma looks forward to the opportunity to deliver our news and other photographs to users in the rapidly growing and highly mobile mass media markets worldwide.

Comments

Sygma believes that the GSTS would be nearly indispensable as a low-cost mobile system for delivering global news and images. With sometimes even a clear telephone contact uncertain in developing countries, GSTS would provide reliable and accurate communication and more importantly, image transmission, at a fraction of the cost of satellite transmissions or ground courier. Sygma photographers, employees and customers in the world press can be contacted and images delivered anytime and anywhere in the populated world. Images of breaking news stories can be transmitted quickly and efficiently to news audiences in a wide variety of markets. The extremely low cost and high mobility of GSTS are extremely attractive to Sygma as our

photographers follow the news as it occurs, where it occurs and as our clients expect immediate delivery of the best news photographs possible. Even the routine business and image transmissions between our international offices and subagencies throughout the world will be made much easier and more inexpensively with GSTS communications.

As breaking world events become more urgent and more frequent, so must the technology used to capture, record and immediately deliver such history to the world as it unfolds. Without information in the information age, modern life would be impossible. The GSTS will allow us to better provide for the needs of news audiences the world over, bringing dramatic news images from the world's battlefields, courthouses and governments to the front pages, the schoolhouses and the coffee houses throughout the world. But even beyond the wars, the violence, the terrible catastrophes, desperate misery and natural disasters, Sygma photographers also cover cultural events, personalities and features exploring subjects as diverse as anthropological inquiries, space exploration, the wonders of nature and advances in science, bringing the world to the world.

The sharing of global news and information is no longer a luxury, it is now a necessity to the global village. With the opportunity to more quickly inform hundreds of millions of newspaper and magazine readers, TV viewers, and Internet surfers, GSTS is poised on the brink of creating a whole new and inexpensive way to get the news and images that matter to all the peoples of the world. To ensure free access to the world's breaking stories by anyone anywhere, the GSTS will help prevent the Global Information Superhighway from

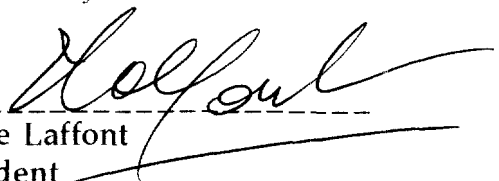
becoming a tollroad while carrying more capacity to more people and places more cheaply.

One of the most remarkable attributes of the GSTS is its ability to serve as a platform for telescopic lens-equipped cameras remotely operated by Sygma via GSTS telecommunications links. For example, we envision photographs taken from GSTS platforms and digitally downlinked in GSTS telecommunications bands to offer a revolutionary ability to document newsworthy events in nearly impossible to reach locations, and to perhaps be of invaluable assistance to search and rescue teams. Because GSTS platforms are 10-20 times closer to the earth than remote sensing satellites, the GSTS is likely to be a far superior method of earth imaging than satellite techniques.

Conclusion

There is an immediate need for GSTS to finally bring broadband communications into the next paradigm so that large digital files may quickly move throughout the world at low cost and from mobile sources to mobile users. The GSTS is worldwide, it's extremely low-cost and it's mobile. There is nothing else like it and we need it. We urge an expeditious approval of the GSTS and the Commission's award of GSTS applications as a result of the remarkable benefits to the worldwide public and industry from this revolutionary new service.

Respectfully submitted,



Eliane Laffont
President
Sygma Photo News
322 8th Avenue
New York, NY 10001

Date submitted: April 30, 1996